

EXHIBIT 13

DECLARATION OF SHELLEY VANESSA DINGUS

I, Shelley Vanessa Dingus, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am at least 18 years of age and am competent to sign this declaration. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.
2. I am 52 years old and am a citizen of England. I have been married for 21 years to a U.S. citizen who is a U.S. Air Force veteran. I have five children, ages 17 to 28; two of them were born in the United States. I have resided in the United States for over nine years.
3. My primary residence is in Norton, Virginia, where I lived with my husband and two younger sons until my detention by ICE. Prior to my detention, I had been working as a senior healthcare specialist for over 18 years.
4. I am currently detained at Irwin County Detention Center (ICDC) in Ocilla, Georgia. I have been in ICE custody since January 2020, when I was placed in removal proceedings based on drug-related convictions that resulted in a suspended sentence, but no jail time.
5. I have suffered from asthma throughout my life and require the use of an albuterol inhaler two-three times per day to treat my condition and prevent my

lungs from collapsing. I also suffer from chronic obstructive pulmonary disease which makes my asthma worse.

6. I have also suffered from eczema since I was a child. This condition causes severe skin allergies and open wounds that, if not properly treated, could become infected. Since I was detained, my skin has become extremely dry, and I have developed scabs all over my scalp. My skin is so itchy that I feel like I have bugs crawling all over me. I have also had severe skin reactions since being at ICDC, I think caused by the laundry detergent used by ICDC to wash detainees' clothes and sheets. I require a consistent regime of body lotion and cream to treat my skin condition.
7. I also have recurrent migraines at least three-four times per week, but ICE has refused to prescribe any medication despite their knowledge that I used to take prescription drugs for this condition before entering ICE detention. The migraines make me extremely sensitive to light and cause me severe headaches that typically last between four and 72 hours. They also make me lose my appetite.
8. In addition, I have been diagnosed with depression and anxiety, for which I used to take anti-depressants prior to my confinement. Since I have been in detention, I have constant panic attacks as often as two to three times per week and can barely get more than three hours of sleep a night.

9. I also need hormone replacement tablets since I had a full hysterectomy 11 years ago. These tablets are critical to my wellbeing, as they reduce my day and night sweats and help me balance my moods. However, ICE does not consistently provide me with these tablets.
10. Living with all these medical conditions is a real challenge here at ICDC. Each morning a “pill” cart comes to my dorm, but some of my medication is often missing. If ICE forgets any of my prescribed medications, I must then make a medical request to the assigned guard. Depending on which guard is on duty, I may or may not get my medication. This is impacting my health. For example, this past Monday evening, ICE forgot to provide me with Singulair, a prescription pill used to help treat my asthma. Whenever I miss taking this tablet, my chest tightens up, and I may have an asthma crisis. I often feel like a child having to beg to get the medicine I need.
11. The frustration of not getting adequate medical care causes my anxiety to skyrocket and deepens my depression. Without proper treatment, I fear for my life and wellbeing, particularly in this time of a public health crisis caused by the spread of COVID-19. It’s upsetting to have to wait four days to obtain something as simple as a Tylenol pill to treat a headache.
12. Medical staff at ICDC do not understand certain medical conditions, and their medical advice is often to ignore one’s symptoms. For example, when I

requested medication for eczema, a medical professional at ICDC gave me a body lotion used to treat acne. It doesn't matter how many times I explain my symptoms and show them my open wounds. For them, my condition is nothing more than dry skin.

13.Despite the COVID-19 crisis, it is impossible to exercise any social distancing here at ICDC. I share a dorm with approximately 68 other women. Our bunk beds are so close together that I can touch my side neighbor's bunk bed from my own bed. In the cafeteria, we also sit very close to each other in overcrowded conditions.

14.It is just not possible to stay six feet away from other people in immigration detention. We all breathe the same air, live in the same enclosed areas, and share common spaces and amenities, such as bathrooms, showers, hand sinks, water fountains, and microwaves. Although ICDC provides liquid soap at the bathroom sinks, each detainee has to press the soap dispenser in order to get soap to wash their hands. There is no way to prevent the spread of a virus in such conditions.

15.Recently, ICDC has started distributing our meals in Styrofoam boxes, but the guards who deliver them don't consistently wear gloves for this purpose. Guards and staff come back and forth to the facility, and there are no guarantees that they have not been infected with the COVID-19 virus.

16. Certain detainees known as the “dorm detail” clean our dorms twice per day.

In recent days, ICE has given them a spray gun containing Lysol which they have been using without any concern for detainees like me who suffer from asthma. Since this practice started, my asthma has gotten much worse, and I have had to rely on my inhaler to keep breathing. ICDC has not provided masks to protect those of us with asthma and have ignored our pleas for help.

17. I have personally not observed any guards or staff wear any personal protective gear such as masks or gloves to prevent the spread of coronavirus.

18. I have not received any information about the symptoms of coronavirus or how to prevent it from spreading. We are basically educating each other based on what we hear from our family on the outside. All the guards tell us is to wash our hands for twenty seconds but nothing else.

19. As detainees, we get limited amounts of hygienic products each week, so we rely heavily on the money that our family members give us to buy products from the commissary. Unfortunately, there are many women in my dorm who don’t have any funds to use at the commissary, so they run out of personal cleaning products.

20. I am very concerned because ICE continues to bring in new detainees from other places, putting us at a higher risk. While none of the new detainees have been placed in my dorm, I am terrified about what could happen if one of them

were sick with coronavirus.

21. Two women in my dorm have presented flu-like symptoms, including cough, sore throat, and fever, but the medical staff has only given them cough drops. In the past two days, my side bunk bed neighbor has had a persistent dry cough, yet she has received nothing from medical staff. No flu or coronavirus testing has been done her or the other women in my dorm with symptoms.
22. To this day, ICE has not done any individualized medical evaluation to determine whether any special measures are needed to treat my asthma, eczema, and other conditions or to reduce my risk of exposure to coronavirus. I am scared they are going to let me die right here.
23. If I am released from detention, I will comply with any applicable conditions of release, including attending check-ins (as I did in January 2020 before I was detained) and immigration court hearings.
24. Upon release, I will go to my home in Virginia and rejoin my husband and two children. I will self-quarantine in accordance with the government's recommendations.
25. I have authorized my attorney to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 31, 2020 at Lake Worth Beach, Florida.

Victoria Mesa-Estrada

Victoria Mesa-Estrada, Esq.

on behalf of Shelley Vanessa Dingus

ATTORNEY DECLARATION

I, Victoria Mesa-Estrada, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Victoria Mesa-Estrada. I am a licensed attorney in good standing in the state of Florida. I am an attorney of record in this litigation.
2. I represent the declarant, Shelley Vanessa Dingus. Out of necessity in light of the COVID-19 pandemic, I signed Shelley Vanessa Dingus's declaration on her behalf and with her express consent.
3. ICE is oftentimes requiring legal visitors to provide and wear personal protective equipment, including disposable vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized for hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Centers for Disease Control and Protection (CDC) has issued statements warning that individuals are at a higher risk of infection when traveling. In addition, I am a resident of Palm Beach County, Florida and unable to travel to Georgia under a state "stay-at-home" order issued by the Governor of Florida Ron DeSantis on April 1st, 2020.

5. In light of the above, to protect public health, I am not able to travel to the Irwin County Detention Center in Ocilla, Georgia, to obtain my client's signature.
6. I spoke with Shelley Vanessa Dingus via phone call, read the declaration to him and confirmed the accuracy of the information therein. Shelley Vanessa Dingus has confirmed the accuracy of the information therein.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 1st, 2020 at Lake Worth Beach, Florida.



Victoria Mesa-Estrada, Esq.

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